

**EXPEDITED CONSIDERATION REQUESTED**

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

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Public Record

SUNBELT CHLOR ALKALI PARTNERSHIP )

Complainant )

v. )

NORFOLK SOUTHERN RAILWAY COMPANY )

and )

UNION PACIFIC RAILROAD COMPANY )

Docket No. NOR 42130

**JOINT MOTION FOR AN EXTENSION OF THE MEDIATION PERIOD AND  
A PARTIAL STAY OF PROCEEDINGS**

Complainant, Sunbelt Chlor Alkali Partnership ("Sunbelt"), and Defendants Norfolk Southern Railway Company ("NS") and Union Pacific Railroad Company ("UP") (collectively the "Parties"), respectfully request that the Surface Transportation Board ("STB" or "Board") enter an order extending the mediation period in the above captioned proceeding by 60 days and staying proceedings on UP's motion for partial dismissal. Expedited consideration of this motion is requested in order to facilitate further mediation and prevent unnecessary motion practice.

On September 28 and 29, 2011, the Parties met to participate in compulsory mediation of their dispute, pursuant to 49 C.F.R. § 1109.4. During the meetings, the Parties engaged in productive dialogue regarding the resolution of all or part of their dispute. To continue this progress, the Parties have agreed to extend the mediation period by 60 days, until November 23, 2011.

On September 26, 2011, two days before the Parties' mediation sessions began, UP filed a motion with the Board for partial dismissal or, in the alternative, expedited determination of

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jurisdiction over challenged rates. Considering the progress made during mediation with UP, further mediation may render the motion unnecessary. Accordingly, the Parties have agreed to a stay of UP's motion, including the tolling of Sunbelt and NS's time to file their replies, until twenty days after expiration of the extended mediation period, which would be December 13, 2011.

For the foregoing reasons, the Parties request that the Board enter an order:

1. Extending the mediation period for 60 days, until November 23, 2011;
2. Holding UP's motion for partial dismissal in abeyance during the extended mediation period; and
3. Extending the due date for replies to UP's motion until December 13, 2011.

Respectfully submitted,

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